
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 19-29735
Tishanna L Winford,)	
)	Chapter 13
)	
Debtor.)	Judge Deborah L. Thorne

NOTICE OF MOTION

TO: Tishanna L Winford, 4724 W Congress Parkway, Apt 2 Chicago, IL 60644, *via US mail*
Marilyn O Marshall, *via ECF clerk's electronic delivery system*
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago, IL 60604 *via ECF clerk's electronic delivery system*
See attached service list

PLEASE TAKE NOTICE that on **November 6 at 9:30 AM** I shall appear before the Honorable Deborah L. Thorne at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 613, Chicago, Illinois, or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice upon the parties named above on October 30, 2019 before the hour of 6:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.,

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FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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Debtor(s))	Judge Deborah L. Thorne

MOTION TO EXTEND STAY

NOW COMES the Debtor, Tishanna L Winford, by and through her attorneys, the law office of CUTLER & ASSOCIATES, LTD., and in support of her Motion, states as follows:

- 1) The Court has jurisdiction over the proceeding pursuant to 28 USC 1334 and the is a “core proceeding” under 28 USC 157(b)(2).
- 2) The Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on October 18, 2019.
- 3) The Debtor proposed a plan that will repay 10% to her unsecured creditors with a payment of \$414.00 for 60 months.
- 4) The Debtor had a prior Chapter 13 case, that was dismissed on August 21, 2019, Case No: 18-07004, within a year of filing, due to the trustee’s motion to dismiss for material default.
- 5) In the prior case, the Debtor did not turn over her 2018 tax returns or tax refund to the Trustee.
- 6) In the prior case, the Debtor used her 2018 tax returns to pay past due rent and catch up on living expenses, to avoid eviction.

- 7) In the instant case, Debtor understands that if required she is to turn over her tax returns and refund.
- 8) In the instant case, Debtor has budgeted her income and expenses and is employed with stable income and can afford her new plan payments.
- 9) In the instant case, Debtor's payments will be made through payroll to ensure timely plan payments, an order has been entered with the court.
- 10) In the instant case, Debtor has had a positive change in circumstances, she is current on her rent payments, and living expenses, she is employed with stable income and can afford her plan payments which will be made through payroll control and she understands she must turn over her tax returns and if she receives a refund is subject to turn it over, she can afford to make monthly trustee payments in a feasible chapter 13 plan.
- 11) Debtor has provided this Honorable Court with an affidavit of change and income and expense schedules, see attached Affidavit and schedules I and J from her previous chapter 13 bankruptcy case, and the schedules I and J from her current chapter 13 bankruptcy case. See Affidavit and Exhibits A and B respectively.

WHEREFORE, the Debtor prays that the Honorable Court enter an Order Extending the Automatic Stay, and for such further relief that the Honorable Court may deem just and proper.

Dated: 10/30/19

Respectfully Submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St,
Skokie, IL 60076
Phone: (847) 673-8600